UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS PECOS DIVISION

UNITED STATES OF AMERICA

Plaintiff,

٧.

WILLIE BEN LARA, III,

Defendant.

Case No. 4:23-CR-00048-DC-1

FACTUAL BASIS

The United States was prepared to show the following facts through competent evidence beyond a reasonable doubt that the Defendant is guilty had this case gone to trial. The defendant and his/her attorney have signed this factual basis. By signing this factual basis, the Defendant admits and stipulates that the following facts are true and accurate and that they support his/her plea of guilt and that the Defendant admits guilt.

On March 5, 2024, a Hudspeth County Sheriff's Office deputy conducted a traffic stop on a silver Ford Escape in Sierra Blanca, Texas, within the Western District of Texas. The driver was identified as Willie Ben LARA, III. The front passenger was identified as Emily Rachael MEDLEY, and the rear passenger was identified as Michael Angelo ESPINOSA.

A U.S. Border Patrol canine conducted a non-intrusive exterior sniff of the vehicle. The canine alerted to the presence of a narcotic odor emitting from the interior of the vehicle. The agent searched MEDLEY's person and located four glass pipes containing methamphetamine residue hidden within her person. Agents located approximately 10.9 grams of fentanyl pills, 2.6

Defendant's Initials

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grams of fentanyl powder, and 3.5 grams of fentanyl in "rock" form known as "cement."

During post-*Miranda* interviews, agents learned that LARA, MEDLEY, and ESPINOSA utilized ESPINOSA's vehicle to travel from Alpine, TX to Chaparral, NM, to obtain the narcotics that were found on MEDLEY's person. The narcotics were to be transported to Alpine, TX, where they would be further distributed and sold to others for payment.

Therefore, Defendant admits that he, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, to wit: less than 40 grams of a mixture or substance containing a detectable amount of fentanyl, a Schedule I controlled substance.

JAIME ESPARZA

UNITED STATES ATTORNEY

Amy I. Greenhaum

Assistant United States Attorney

I am counsel for Defendant, Willie Ben Lara, III, in this case. I have fully explained to Defendant all of Defendant's rights with respect to the pending criminal charge. I have carefully reviewed this factual basis in its entirety with Defendant and provided Defendant with my best professional advice. In my opinion, Defendant's decision to admit to this factual basis is made freely, voluntarily, and with full knowledge of its obligations and consequences.

DATE: 6/25, 2024

Jaime Escuder, III
Attorney for Defendant

I, Willie Ben Lara, III, have carefully read and reviewed the entirety of this factual basis, or it has been read to me (and if necessary, translated for me) and reviewed with me by my attorney. After careful consideration and discussion with my attorney, and fully understanding my rights with respect to the pending criminal charge(s), I freely and voluntarily agree to the specific facts contain within this factual basis.

Defendant's Initials

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DATE: 6/25, 2027

Willie Ben Lara, III

Defendant

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